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TRANSCRIPT OF PROCEEDINGS

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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JAN 10 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

IN THE MATTER OF:

TRINITY BROADCASTING OF FLORIDA, INC.  
and  
GLENDALE BROADCASTING COMPANY

MM DOCKET NO. 93-75

Miami, Florida

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The above-entitled matter came on for hearing  
pursuant to Notice before Judge Joseph Chachkin,  
Administrative Law Judge, at 2000 L Street, N.W., Washington,  
D.C., in Courtroom No. 3, on Monday, December 13, 1993, at  
9:30 a.m.

## APPEARANCES:

On behalf of Trinity Broadcasting of Florida, Inc.:

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NATHANIEL EMMONS, Esquire  
Mullin, Rhyne, Emmons, and Topel, PC  
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On behalf of Glendale Broadcasting Company:

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Cohen and Berfield, P.C.  
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Washington, DC 20036

On behalf of S.A.L.A.D.:

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1800 NW 187th Street  
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1 APPEARANCES: (Continued):

2 On behalf of Mass Media Bureau:

3 JAMES SHOOK, Esquire  
4 GARY SCHONMAN, Esquire  
5 Mass Media Bureau  
6 2025 M Street, NW  
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1	<u>I N D E X</u>				
2	<u>Witness</u>	<u>Direct</u>	<u>Cross</u>	<u>Redirect</u>	<u>Recross</u>
3	Mrs. Jane Duff				
4	Mr. Schonman		2114		
5	Mr. McCurdy		2208		
6	Mr. Topel			2234	
7					
8					
9	<u>E X H I B I T S</u>				
10	<u>TRINITY</u>	<u>IDENTIFIED</u>	<u>RECEIVED</u>	<u>REJECTED</u>	
11	Exhibit No. 118	2244	2246		
12	Exhibit No. 119	2247	2249		
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24	Hearing began: 9:30 a.m.		Hearing Ended: 4:00 p.m.		
25	Lunch Break Began: 12:25 p.m.		Lunch Break Ended: 1:30 p.m.		

## P R O C E E D I N G S

JUDGE CHACHKIN: Are we ready to resume?

MR. SCHONMAN: Yes, sir.

JUDGE CHACHKIN: All right. On the record.

Continue, please.

MR. SCHONMAN: Thank you, Your Honor.

BY MR. SCHONMAN:

Q Mrs. Duff, can you turn to Volume Six of the Bureau's exhibits. And we'll be looking at Bureau Exhibit Number 324. And that's an independent auditor's report for Community Educational T.D. Inc. dated September 28, 1990. Now, Mrs. Duff, how did Goodrich, Goodyear, and Heinz come to prepare this on behalf of CET?

A I don't have a specific recollection of this.

Q Is Goodrich, Goodyear, and Heinz the same company that prepared TBN's audit in, in late 1990?

A Yes.

Q Why was this report sent to Tustin, California, if CET had moved to Texas, at that time?

A The board -- some of the board members, such as myself, reside in California and our offices are in Tustin.

Q We can turn to Bureau Exhibit Number 325. Would you turn to page five of this return of organization exempt from income tax for 1989. And above the, the stamp named Goodrich, Goodyear, and Heinz, there is no signature. Do you know if,

1 if NMTV has a, a 1989 Form 990 that was signed?

2 A I've never seen one.

3 Q I'm sorry?

4 A I, I have never seen one that -- you mean in, in the  
5 form of a, a copy that has a signature? I don't believe that  
6 I've ever seen one like this.

7 Q A, a copy or an original that has a signature.

8 A No, sir. I, I can't say that I have seen one. Not  
9 to my recollection, anyway.

10 Q Did you review -- well, strike that. Do you know if  
11 this form was, was actually filed with the Department of  
12 Treasury?

13 A I don't have any direct knowledge, no.

14 Q Do you recall re, reviewing this at any time before  
15 today?

16 A It would have been my practice to review it, but I,  
17 I don't have a recollection of it.

18 Q Who would have provided the information that went  
19 into this form? Well, let me rephrase that. Would TBN's  
20 Accounting Department have provided the information that went  
21 into this form?

22 A Yes.

23 Q You can turn to Bureau Exhibit Number 326, and  
24 that's a letter from George Sebastian to Mr. Dave Libby,  
25 L I B B Y, dated October 4, 1990. Did NMTV have a low-power

1 TV director in October, 1990?

2 A No, sir.

3 Q Do you know why George Sebastian identified himself  
4 as such in this letter?

5 A No, sir.

6 Q Did you see this letter at the time it was mailed?

7 A I don't have a recollection of it, no.

8 Q You can turn to Bureau Exhibit Number 327. This --  
9 these are the minutes of a special meeting of NMTV on  
10 October 5, 1990. And you notice that Reverend Aguilar was not  
11 in attendance at this meeting. And my question for you is do  
12 you know why he was not in attendance?

13 A I don't have a recollection. If, if I did know, I  
14 -- at the time, I, I don't remember.

15 Q Turning to Bureau Exhibit Number 328, that's a memo  
16 from NMTV's Engineering Department to Darlene Eve dated  
17 October 10, 1990.

18 A Yes.

19 Q In October, 1990, did NMTV have an Engineering  
20 Department?

21 A No.

22 Q Do you have any knowledge as to why Ben Miller  
23 identified himself as working for Engineering in NMTV's  
24 Engineering Department?

25 A No.

1 Q Do you recall seeing this letter or a copy of it --  
2 I'm sorry, receive this memo or a copy of this memo at the  
3 time it was prepared and sent to Darlene Eve?

4 A No, I, I don't remember seeing it.

5 Q Who is Eddie Sills?

6 A He was the assistant chief engineer that -- I think  
7 he was there at the time that -- he, he was there after the  
8 original chief engineer left.

9 Q He was where?

10 A He was at Odessa.

11 Q You can turn to Bureau Exhibit Number 329. And this  
12 is an interoffice memo from Paul Crouch to all station  
13 managers dated October 12, 1990. Mrs. Duff, was, was this  
14 memo sent to NMTV stations, as well as to TBN stations?

15 A I think I decided that it was a good policy and I  
16 was -- and I sent it on to the Portland station.

17 Q Your answer is yes?

18 A Yes.

19 Q You can turn to Bureau Exhibit Number 332.  
20 Mrs. Duff, is that your signature on page two of this  
21 ownership report?

22 A Yes.

23 Q Did you ask Colby May to prepare this ownership  
24 report and the covering letter?

25 A Yes.



1           Q     You can turn to Bureau Exhibit Number 334. And  
2 that's a letter to you from the Bank of California dated  
3 December 7, 1990. Mrs. Duff, what was the purpose of this  
4 letter?

5           A     I believe I had referred to this earlier and I was a  
6 little bit out of sequence timewise, but this is the letter of  
7 credit that I negotiated with the bank in order to provide the  
8 underlying line of credit for the purchase of the Wilmington  
9 station.

10          Q     Why did you seek a line of credit from the Bank of  
11 California?

12          A     In order to negotiate the, the purchase of WTGI 61  
13 in Wilmington, Delaware.

14          Q     That's the station that NMTV was contemplating  
15 purchasing?

16          A     Yes.

17          Q     Mrs. Duff, if you turn to page two of this letter of  
18 credit, paragraph three, subsection A, it says security, and  
19 it says as security for all obligations of the borrower under  
20 the line of credit, cash will be pledged in the amount of  
21 \$3,600,000 in a depository account with the Bank of California  
22 from a source acceptable to the bank. Do you see that?

23          A     Yes.

24          Q     Now if I'm reading this correctly, the security was  
25 cash? Or, or this letter contemplated that the security would

1 be cash?

2 A Yes.

3 Q And I, I, I'm curious about something, perhaps you  
4 can help me with this. Why would NMTV approach a bank to  
5 obtain a line of credit -- well, strike that. Did NMTV have  
6 \$3,600,000 that it could pledge to the bank as security for  
7 this line of credit?

8 A No.

9 Q That being the case, where was NMTV going to get the  
10 money that it would pledge to the bank?

11 A We were anticipating a loan from TBN. I think, as I  
12 explained before, I negotiated these terms so that it would  
13 not appear, during our negotiations, that we had -- in other  
14 words, that TBN was going to loan us the money, because it  
15 would be perceived as us being deep-pockets and we might not  
16 be able to negotiate as attractive a price for the purchase of  
17 the station. So I negotiated to not have TBN mentioned in  
18 the, the note.

19 Q So this line of credit then was for, essentially,  
20 appearances only? The money was going to come from TBN?

21 A Yes.

22 Q For the Wilmington station.

23 A Right.

24 Q You can turn to Bureau Exhibit Number 335. That's a  
25 memo to Eddie Sills from Ben Miller dated December 10, 1990.

1 In December, 1990, Mrs. Duff, did NMTV have an Engineering  
2 Department?

3 A No.

4 Q Have you read through this memo?

5 A I'm just -- yes.

6 Q All right. There's a reference to Steve Hastings in  
7 Dallas. Who is Steve Hastings?

8 A Steve Hastings is the engineering expert that is on-  
9 call. Ben Miller used him frequently to resolve large -- big  
10 problems with transmitters at different stations.

11 Q Who does he work for?

12 A He works for, for TBN.

13 Q He's an employee of TBN?

14 A Yes.

15 Q At TBN's Dallas station?

16 A I believe he is based in Dallas.

17 Q Do you know why Ben Miller is recommending to, to  
18 Eddie Sills that they -- that, that Mr. Sills contact a TBN  
19 employee for, for test equipment?

20 A Steve Hastings had, shall I say, one of a kind  
21 knowledge. He was the type of person that anybody would like  
22 to tap into his resources, and anybody that had severe  
23 problems knew about this man, and they would be most likely to  
24 try and get his expertise.

25 Q Was he also a consultant to NMTV?

1 A Yes. From time to time, yes.

2 Q Was he retained by Ben Miller to do work for NMTV  
3 stations?

4 A Ben would usually be the contact. There are  
5 occasions when I would call him.

6 Q What occasions were those?

7 A If Ben were not available. Ben travelled a lot.  
8 And I have had occasion to call Steve and ask him for help.

9 Q For which stations?

10 A I don't have a recollection whether it was -- it, it  
11 might have been Odessa, but I'm, I'm not sure.

12 Q You can turn to Bureau Exhibit Number 336. This is  
13 an interoffice memo from George Sebastian to Paul Crouch  
14 regarding an NMTV station, is that correct?

15 A Yes.

16 Q And Mr. Sebastian cc'd copies of this interoffice  
17 memo to several individuals, some of whom I recognize and  
18 others I don't. There's a cc to you, to Ben Miller. There's  
19 a cc to an individual by the name of Stan Hollon, H O L L O  
20 N. Who is that?

21 A He was employed by TBN at one time. He would do  
22 the, the printing and he was responsible for the newsletter,  
23 at one point in time.

24 Q TBN's newsletter?

25 A Yes.

1 Q Who is Rod Henke, H E N K E?

2 A Rod is responsible for media service agency and he  
3 sells air time.

4 Q Deanna Sebastian?

5 A She was in my department. She was in charge of  
6 putting things into the computer.

7 Q And in December, 1990, what was Al Brown's capacity?

8 A I believe he was Director of Finance at that time.

9 Q Rod Henke sold air time for TBN?

10 A Yes.

11 Q Before we continue with the list, I'd like to go  
12 back to Stan Hollon. What exactly were Mr. Hollon's  
13 responsibilities with regard to the newsletter?

14 A He would actually put it in print. They would do  
15 the layout on computer, and he would convey the information to  
16 the company that actually did the printing. And he was  
17 responsible for deadlines and making sure that the newsletter  
18 was composed, and that it got to the, to the printer in a  
19 timely manner. He did all the, the finishing, as far as  
20 making sure that all the different articles were, were put in  
21 -- he would contact everybody that need to, needed to provide  
22 information for the newsletter and he would assemble it.

23 Q Did he have any editorial input into the  
24 newsletters?

25 A Not to my knowledge.

1 Q Who is Rod Henke, H E N K E?

2 A Rod is responsible for media service agency and he  
3 sells air time.

4 Q Deanna Sebastian?

5 A She was in my department. She was in charge of  
6 putting things into the computer.

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12 back to Stan Hollon. What exactly were Mr. Hollon's  
13 responsibilities with regard to the newsletter?

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15 the layout on computer, and he would convey the information to  
16 the company that actually did the printing. And he was  
17 responsible for deadlines and making sure that the newsletter  
18 was composed, and that it got to the, to the printer in a  
19 timely manner. He did all the, the finishing, as far as  
20 making sure that all the different articles were, were put in  
21 -- he would contact everybody that need to, needed to provide  
22 information for the newsletter and he would assemble it.

23 Q Did he have any editorial input into the  
24 newsletters?

25 A Not to my knowledge.

1 Q How long did he carry out those responsibilities, or  
2 I should ask how long has he carried out those  
3 responsibilities?

4 A He is no longer at TBN. He was there probably from  
5 the mid '80's until about two years ago.

6 Q Who performed those responsibilities before  
7 Mr. Hollon joined TBN, if you recall?

8 A There was another person, though I can't remember  
9 that person's name. It was another printer. In fact, there  
10 were two others. A Mr. Pete Ingram, at one time, and then the  
11 printer, individual. I, I just don't have a recollection of  
12 the name.

13 Q Now who has performed those responsibilities since  
14 Mr. Hollon left TBN?

15 A Alan Foster.

16 Q All right. Continuing down the list of persons who  
17 received copies of this interoffice memo, who is Bob Higley,  
18 H I G L E Y?

19 A Bob Higley is the head of TBN's Cable Department.

20 Q Jim Planck is with the construction company?

21 A Yes.

22 Q Lavera Johnson?

23 A Lavera Johnson, at this particular time, I believe  
24 she is the receptionist that answers phone inquiries from  
25 viewers.

1 Q Kim Tingley, T I N G L E Y?

2 A I believe that, at one time, Kim was my -- I don't  
3 know if it was my secretary or -- I'm not sure what department  
4 Kim worked in, in 1990.

5 Q In any event, she worked for TBN?

6 A Yes. She was a clerical of some type.

7 Q We've already discussed last week advanced  
8 insurance. I believe you testified about Pat St. John Clerke.  
9 Who is Alice Fields?

10 A She was Ben Miller's secretary.

11 Q You can turn to Bureau Exhibit Number 338. And  
12 that's an annual meeting of NMTV held on January 21, 1991. I  
13 notice that Reverend Aguilar was absent from this annual  
14 meeting. And my question to you is do you know why?

15 A No, I'm sorry, I do not.

16 Q Who prepared the minutes of this 1991 meeting?

17 A I think Mr. Juggert prepared the minutes.

18 Q Now it says in the next to last paragraph that  
19 current officers and directors were also elected to new terms.  
20 What were the terms of office that the officers were elected  
21 to?

22 A I don't -- I think that the bi-laws call for the  
23 officers and directors to serve for three years, but it just  
24 seemed to be a pattern that we had an election every --  
25 annually.



1 Q We can turn to Bureau Exhibit Number 339. This is  
2 combined annual meeting for TBN held in 1991, also on  
3 January 21, 1991. Why did you attend this annual meeting,  
4 Mrs. Duff?

5 A As a responsibility as assistant to Mr. Crouch.

6 Q He asked you to attend this meeting?

7 A That was my responsibility to be there, yes, to be  
8 on the front row and be available for whatever he needed me  
9 for.

10 Q Can you turn to page 11 of these minutes. There,  
11 there is a discussion there about Colby May and I think it  
12 would be helpful if you read through the remainder of that  
13 page. Do you see that?

14 A Yes.

15 Q You've read that, Mrs. Duff?

16 A Yes, sir. That one paragraph, though.

17 Q I'm sorry?

18 A That one paragraph. Is that what you were  
19 referring?

20 Q No. The remainder of the page.

21 A Oh, okay.

22 Q From --

23 A I'm sorry.

24 Q -- from the underlined section, Colby May, FCC  
25 Attorney, down.

1 A Okay.

2 Q I'm interested in the recommendations that Mr. May  
3 made. You've read through that?

4 A Yes.

5 Q All right. I'm -- I'm not going to be asking  
6 questions about each and every detail here, but, for example,  
7 in the third complete paragraph down, that's the paragraph  
8 that begins: the FCC is focusing on tower lighting and  
9 painting. Do you see that?

10 A Yes.

11 Q The next to the last sentence of that paragraph  
12 states: a log should be kept of our attentions when we  
13 notice, etc., etc.

14 A Yes.

15 Q Can you tell me if NMTV applied these  
16 recommendations to its stations, as did TBN?

17 A I don't know if that particular recommendation was  
18 followed. That would be something that I would have followed  
19 up with the engineers on, but I, I can't recall whether we did  
20 that or not.

21 Q All right. Further down, the paragraph which  
22 begins: revised pages of the personal -- personnel manual  
23 were distributed.

24 A Yes.

25 Q And my question to you is did NMTV update its

1 personnel manual with those updated pages, as well as the, as  
2 the TBN stations?

3 A I believe we did.

4 Q Turning to page 12, you identify yourself as acting  
5 secretary.

6 A Yes.

7 Q Is that your signature at the bottom?

8 A Yes.

9 Q Are you identifying yourself there as acting  
10 secretary of TBN?

11 A You'll notice that on page nine, where it says the,  
12 the title 1990 an -- annual meeting, and then underneath it  
13 says day two.

14 Q Yes, I see that.

15 A This was reports for station managers and department  
16 heads, and so I took these minutes as acting secretary.

17 Q As acting secretary of TBN?

18 A Yes. At the request of Mr. Crouch.

19 Q So you weren't elected to that position?

20 A For TBN?

21 Q Yes.

22 A No.

23 Q Were you acting in that capacity just for the  
24 purpose of taking the minutes --

25 A Yes.

1 Q -- on the day --

2 A Yes.

3 Q -- of this meeting?

4 A Right.

5 Q You can turn to Bureau Exhibit Number 340. That's a  
6 technical memorandum from Ben Miller to Darlene Eve dated  
7 January 24, 1991. And there are two pages in this exhibit,  
8 Mrs. Duff.

9 JUDGE CHACHKIN: What is your question,  
10 Mr. Schonman?

11 MR. SCHONMAN: Thank you, Your Honor.

12 BY MR. SCHONMAN:

13 Q My question is who, if anyone, asked Ben Miller to  
14 send this memo to Darlene Eve in Odessa?

15 A I did.

16 Q Why did you ask him to do that?

17 A Because I had reviewed this operator book and I  
18 thought it was an outstanding way of assisting our stations  
19 not only to, to train new people, but also to improve the  
20 skills of the operators that were already there at the  
21 station. And I thought it was a, a way of assisting the  
22 stations and improving their -- the performance of the  
23 employees.

24 Q So NMTV adopted the same manual as the TBN stations?

25 A Yes.

1 Q Can you -- can you explain to me what page two is,  
2 of this exhibit?

3 A I've never seen this before. However, it appears  
4 that Mr. Miller is giving instructions for his secretary, a  
5 list -- a distribution list to send to various affiliate  
6 stations, as well as TBN stations.

7 Q In other words, the same item or the same document  
8 would be sent to different organizations on different  
9 letterheads and different envelopes with different titles?

10 A Well, he was just instructing her to send -- well, I  
11 guess that's what he did. I -- he was making sure that all  
12 the stations would get a copy of the, of the manual.

13 Q You can turn to Bureau Exhibit Number 342. And  
14 that's a special meeting of TBN on February 20, 1991. Did you  
15 attend this meeting, Mrs. Duff?

16 A I don't believe I did.

17 Q We can turn to Bureau Exhibit Number 343. And  
18 that's a letter from Joseph Dunne, of the law firm of May and  
19 Dunne, to Mr. George Sebastian dated February 22, 1991.  
20 You've read through that?

21 A Yes.

22 Q From the first line of this letter, it would appear  
23 that you had a conversation with, with Mr. Dunne about both  
24 TBN and N, NMTV matters --

25 A Yes.

1 Q -- in the same conversation. Why is it that  
2 Mr. Dunne would write to George Sebastian about an NMTV  
3 matter?

4 A Because I had an agreement with George to assist in  
5 preparing the applications for NMTV.

6 Q Was that agreement reduced to writing?

7 A Yes.

8 Q What was the nature of that agreement with George  
9 Sebastian?

10 A It was a consulting agreement.

11 Q Is that -- is there a copy of that agreement still  
12 in existence?

13 A I believe it was part of our production of  
14 documents.

15 Q I don't recall ever seeing that. I, I don't think  
16 I, I know I never saw it.

17 JUDGE CHACKIN: Mr. Topel, you have anything to  
18 say?

19 MR. TOPEL: Your Honor, there were some 30 or 40,000  
20 documents for these gentlemen to review. I -- all I can say  
21 is we did everything humanly possible to produce everything  
22 that was in the categories, but I can't specifically say what  
23 was, what was in there.

24 BY MR. SCHONMAN

25 Q You can turn to Bureau Exhibit Number 344, which is

1 a letter from Colby May to you at Trinity dated March 8, 1991.  
2 And my question to you, Mrs. Duff, is that do you have any  
3 knowledge as to why Mr. May is writing to you at TBN about a  
4 matter regarding, at least in part, NMTV?

5 A That was his, his method of communicating with me,  
6 because I dealt with issues regarding both entities.

7 Q Did you ever tell him to separate his correspondence  
8 or in any way distinguish between matters involving NMTV and  
9 TBN when he was corresponding with you?

10 A Not as -- I didn't -- I don't believe I ever told  
11 him to separate something that would be as routine as this.  
12 I, I didn't really see that it was all that necessary, because  
13 this was so simple, I, I just didn't really think it was that  
14 -- it was a problem.

15 Q We can turn to Bureau Exhibit Number 345. My  
16 question for you, Mrs. Duff, were the same or similar letters  
17 sent to TBN stations as well?

18 A Yes.

19 Q Bureau Exhibit Number 346. My question for you,  
20 Mrs. Duff, is who would have asked Mr. Ben Miller to, to  
21 request this, this form?

22 A I could only make a guess that it would --

23 Q No?

24 A -- you know, I don't know.

25 Q Would it have been his responsibility to do so in

1 the normal course of business?

2 A Yes, it would be.

3 Q We can turn to Bureau Exhibit Number 347. That's an  
4 application for assignment to NMTV at the, the Delaware  
5 station -- Wilmington station, rather. At least part of the  
6 application, I should say. Mrs. Duff, if you turn to page  
7 nine, that's the signature page. Is that your signature?

8 A That appears to be, yes.

9 Q Who asked Mr. May to prepare this application and  
10 the covering letter?

11 A I believe I did.

12 Q Was there any board action authorizing Mr. May to do  
13 this, or you did so independently of the board?

14 A Well, we had board authorization to purchase the  
15 station, so it would have been my responsibility to follow  
16 through. And there was no specific board action for the  
17 application itself, no.

18 Q We can turn to Bureau Exhibit Number 348. And  
19 that's a special meeting of NMTV on April 5, 1991. And I  
20 notice that Reverend Aguilar was absent from this meeting as  
21 well. My question for you is do you know why he was absent  
22 from this meeting?

23 A No, I do not.

24 Q We can turn to Bureau Exhibit Number 350, which is  
25 another interoffice memo from George Sebastian to Paul Crouch



1 regarding a Portland, Maine, station. And that's NMTV's  
2 station in Portland, Maine, is that correct, Mrs. Duff?

3 A Yes.

4 Q A copy of this interoffice memo was sent to several  
5 individuals, some of whom I don't think we've gone over.  
6 They, they did not appear on the last memo we discussed.  
7 Among them is an individual by the name of Virginia Gonzalez.  
8 Who is that, if you recall?

9 A Virginia is a part of the Purchasing Department.  
10 She works with Engineering and she would actually work side by  
11 side with Pat St. John Clerke.

12 Q There is another individual, this one by the name of  
13 Holly Johnson.

14 A Holly, at that time, was in the Cable Department.

15 Q TBN's Cable Department?

16 A Yes.

17 Q Mary Powell, P O W E L L?

18 A Mary Powell and Cynthia Shields and Lavera Johnson  
19 all answered telephone calls and they would need to know of  
20 any new stations that went on the air.

21 Q Dixie West?

22 A Dixie West also answered telephone calls.

23 Q This is for TBN, I assume, all of your answers?

24 A Yes.

25 Q Robbie Mickley, M I C K L E Y?